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Attorneys for the Receiver, Marti P. Murray

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE	:	
COMMISSION,	:	15-CV-9764 (WHP)
	:	
Plaintiff,	:	
v.	:	
	:	
ATLANTIC ASSET MANAGEMENT,	:	
LLC,	:	
	:	
Defendant.	:	

**NOTICE OF RECEIVER'S FINAL REPORT AND MOTION (I) TERMINATING THE
RECEIVERSHIP; (II) DISCHARGING RECEIVER AND HER PROFESSIONALS;
AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that upon the proposed order annexed hereto as **Exhibit A** (the "Closing Order"), and upon the accompanying Receiver's Final Report and Memorandum of Law in Support of Motion (I) Terminating the Receivership; (II) Discharging Receiver and Her Professionals; and (III) Granting Related Relief (the "Motion"), and the pleadings herein, Marti P. Murray, the receiver ("Receiver") of Atlantic Asset Management ("AAM") will move before the Honorable William H. Pauley, III, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time set by the Court, for the entry of an order pursuant to 15 U.S.C. § 77v(a), 15 U.S.C. § 78aa, and the Court's inherent equitable authority, (i) terminating the receivership, (ii) discharging the Receiver and her professionals; and (iii) granting related relief.

PLEASE TAKE FURTHER NOTICE that by this Motion the Receiver seeks the entry of an order, substantially in the form annexed hereto as Exhibit A, terminating the receivership, discharging the Receiver from her duties and responsibilities, enjoining any and all claims against the Receiver and the Receiver's professional advisors, and authorizing the Receiver to take appropriate actions to wind up the receivership.

PLEASE TAKE FURTHER NOTICE that the moving papers are available for inspection and copying during regular business hours at the Office of the Clerk of the District Court, by written request to the District Court Clerk's Offices, or by using the PACER filing system utilized by the District Court at <<http://ecf.nysd.uscourts.gov>>.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion may be scheduled for a date and time to be determined by the Court in the event that one or more objections are timely filed to the relief sought herein. If no timely objections are filed, the Court may enter an Order ruling on the Motion without a hearing.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (i) be in writing; (ii) state the name and address of the responding party and the amount and nature of the claim or interest of such party; (iii) state with particularity the legal and factual basis of any response or objection; and (iv) be served together with proof of service, with a hard copy to Chambers, so as to be actually received not later than **5:00 p.m. EDT on April 10, 2019** (the "Objection Deadline") and be completed by the Objection Deadline by email or facsimile service on all counsel who have entered an appearance in this action.

Dated: New York, New York
March 26, 2019

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP

By: Tracy L. Klestadt
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Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ATLANTIC ASSET MANAGEMENT,
LLC,

Defendant.

15-CV-9764 (WHP)

**[PROPOSED] ORDER (I) TERMINATING THE RECEIVERSHIP; (II) DISCHARGING
RECEIVER AND HER PROFESSIONALS; AND (III) GRANTING RELATED RELIEF**

The Court, having considered Receiver's Final Report and Memorandum of Law in Support of Motion (I) Terminating the Receivership; (II) Discharging Receiver and Her Professionals; and (III) Granting Related Relief, and finding that adequate notice as set forth in the Notice of Motion has been given and that no further notice is necessary, and, after due deliberation, and finding good and sufficient cause for the relief sought herein, and the Court having found that it has authority pursuant to 15 U.S.C. § 77v(a), 15 U.S.C. § 78aa, and its inherent equitable authority to terminate the receivership, authorize the Receiver to perform the limited activities required to wind-up the receivership as set forth in the Motion, and to discharge the Receiver and her professional advisors,

IT IS THEREFORE ORDERED that the Receiver's motion for an order terminating the receivership and discharging the Receiver and his professional advisors is **GRANTED**.

IT IS FURTHER ORDERED that the Receiver is hereby authorized and directed, pursuant to 28 U.S.C. § 2041, to turn over to the SEC any remaining funds once the Receiver has completed winding up the receivership estate.

IT IS FURTHER ORDERED that the Receiver is hereby authorized to take any action and execute any documents he may deem appropriate and/or necessary to carry out the terms of this Order.

IT IS FURTHER ORDERED that the Receiver is hereby authorized to pay any ordinary course expenses or expenses of her professionals or others retained to assist the Receiver.

IT IS FURTHER ORDERED that the Receiver is no longer bound by and hereby is discharged and released from her duties, obligations, and responsibilities as Receiver as set forth

in the Receivership Order, and any other orders of the Court related to her service or appointment as Receiver, except as to carry out the tasks specified in this Order.

IT IS FURTHER ORDERED that the Receiver and her attorneys, accountants, consultants and other professionals, and all persons acting by, through, under or in concert with any of them, shall not be liable to anyone for his, her, or their own good faith compliance with: (i) any order, rule, law, judgment or decree; (ii) the duties and responsibilities as Receiver or as professional to the Receiver; and/or (iii) any actions taken or omitted by them, except on a finding by this Court that she, he, it or they acted or failed to act as a result of bad faith or gross negligence or in reckless disregard of her, his, its or their duties.

IT IS FURTHER ORDERED that all creditors, investors, and other parties in interest shall be permanently and forever barred, restrained and enjoined from taking any action to impose or seeking to impose liability on the Receiver and her professionals, without first obtaining relief to do so from the Court and only limited to the extent provided by the exception in preceding paragraph.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS FURTHER ORDERED that the above-captioned case is hereby closed.

Dated: New York, New York
_____, 2019

UNITED STATES DISTRICT JUDGE